



June 16, 2023

**VIA ECF**

The Honorable Louis L. Stanton  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl St., New York, NY 10007-1312

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, 1:22 Civ 02435 (LLS)(SN)

Dear Judge Stanton:

We represent Defendants Tracy Wolff, Entangled Publishing, Macmillan, and Universal City Studios, and write pursuant to Rule 3.B of Your Honor's Individual Practices regarding filing redacted documents under seal and in connection with the parties' Protective Order (ECF No. 50) and the Second Circuit's opinion in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Defendants filed under seal Exhibit A to their June 16, 2023 letter. This exhibit is a 2011 draft of Plaintiff's unpublished manuscript, which she has produced in discovery and marked confidential. Defendants are filing the manuscript under seal to protect Plaintiff's purported confidentiality interest but note that this document has allegedly been registered with the Copyright Office, meaning it is publicly available. Further, Defendants reserve the right to request that the manuscript be unsealed if Plaintiff takes an action that waives confidentiality and would not object to unsealing Exhibit A.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

By: /s/ Benjamin S. Halperin

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